

March 4, 2021

Hon. Peggy Kuo
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

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Re: *NOVAGOLD Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK; Unopposed Motion to Extend Time to Join New Parties or Amend Pleadings

Dear Magistrate Judge Kuo:

We write on behalf of NOVAGOLD Resources Inc. (“NOVAGOLD”) to request a modification of one deadline in the Court’s Discovery Plan/Scheduling Order [Dkt. 30]. Currently, the deadline to file a motion to join new parties or amend the pleadings is March 9, 2021. NOVAGOLD requests that this deadline be extended to May 7, 2021. NOVAGOLD served its First Interrogatories and Requests for Production of Documents to Defendant J Capital Research USA LLC (“JCAP”) on October 9, 2020. JCAP has lodged many objections to the interrogatories and requests for production of documents and has yet to produce any documents. The parties are engaged in discussions to resolve outstanding discovery disputes; however, to date NOVAGOLD has not been provided with the information or documents from which it might determine whether joinder or amendment of the First Amended Complaint is necessary or appropriate. This is NOVAGOLD’s first request for extension of time, and we do not believe that the requested extension would affect any other scheduled dates or deadlines.

We have conferred with counsel for JCAP regarding this request, and JCAP does not oppose the request to extend this deadline.

Respectfully,
/s/ Jonathan Rubenstein
Jonathan Rubenstein